

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: KARLA J SCHNECK

) Case No. 18 B 12173
)
Debtor) Chapter 13
)
) Judge: DONALD R CASSLING

NOTICE OF MOTION

KARLA J SCHNECK
1289 MAROON DR
ELGIN, IL 60120

CUTLER & ASSOC
via Clerk's ECF noticing procedures

Please take notice that on October 10, 2019 at 9:30 am my designee or I will appear before the Honorable Judge DONALD R CASSLING at 219 South Dearborn Courtroom 619, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the person(s) named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on September 20, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO OBJECT TO DISCHARGE

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to enter an order determining that debtor is not entitled to a discharge, stating as follows:

1. Debtor (s) filed the above-captioned Chapter 13 case on April 25, 2018.
2. The debtor(s) filed a previous Chapter 7 case, # 15-20882 filed on Jun 16, 2015, discharge having been issued on Sep 29, 2015.
3. Pursuant to 11 U.S.C. § 1328 (f), "the court shall not grant a discharge of all debts provided for in the plan or disallowed under section 502, if the debtor received a discharge--
(1) in a case filed under chapter 7, 11, or 12 of this title during the 4-year period preceding the date of the order for relief under this chapter, or
(2) in a case filed under chapter 13 of this title during the 2-year period preceding the date of such order."

WHEREFORE Trustee prays that the Court enter an order that the debtor or debtors are not entitled to a discharge.

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn